

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ZACHARY POOLE,

Plaintiff,

v.

CASE NO: 2:19-cv-13544
HON: LAURIE J. MICHELSON

MACOMB COUNTY, RYAN STATELER,
and WILLIAM HOPPE,
in their individual and official capacities,

Defendants.

CHRISTOPHER TRAINOR & ASSOCIATES CHRISTOPHER J. TRAINOR (P42449) SHAWN C. CABOT (P64021) MARK A. PROUDMAN (P81791) Attorneys for Plaintiff 9750 Highland Road White Lake, MI 48386 (248) 886-8650 / (248) 698-3321 (fax) shawn.cabot@cjtrainor.com mark.proudman@cjtrainor.com	CORPORATION COUNSEL JOHN A. SCHAPKA (P36731) ROBERT S. GAZALL (P41350) Attorneys for Macomb County and Hoppe One S. Main Street, 8 th Floor Mount Clemens, MI 48043 586-469-6346 John.schapka@macombgov.org Robert.gazall@macombgov.org
	ALLEN BROTHERS PLLC JAMES P. ALLEN, SR. (P52885) JAMES M. SUROWIEC (P49560) Attorneys for Defendant Stateler 401 N. Main Street Royal Oak, MI 48067 248-951-9060 jamesallen@allenbrotherspllc.com jsurowiec@allenbrotherspllc.com

PLAINTIFF'S INITIAL LAY WITNESS LIST

NOW COMES Plaintiff, **Zachary Poole**, by and through his attorneys,
CHRISTOPHER TRAINOR & ASSOCIATES, and for his Initial Witness List
discloses the following witnesses:

1. Zachary Poole
Plaintiff
c/o Plaintiff's Counsel
2. Antwone Tyrone Ayers
7493 Iowa Street
Detroit, MI 48212
(313) 365-5003
3. Welton Joseph Turner
58535 Main Street
New Haven, MI 48048
(586) 229-9660
4. Macomb County
Defendant
c/o Defendants' Counsel
5. Ryan Stateler
Defendant
c/o Defendants' Counsel
6. William Hoppe
Defendant
c/o Defendants' Counsel
7. Demetrice Pearson
Inmate Number 379203
8. Michael A. Cutler
198 Hubbard Street, Apt 12
Mount Clemens, MI 48043
9. Michael Mitchell
Inmate Number 149778

10.Niki R. Martin

11.Rashad Whitseh
Inmate Number 374437

12.Harold Benson

13.Cathy Poole
13625 Penrose Court
Warren, MI 48088
(586) 663-9190

14.Kalen Poole
15633 Common Road
Roseville, MI, 48066
(586) 565-4515

15.Any and all employees, agents, medical treatment providers, representatives,
and/or custodian of records for the following:

a. Macomb County Sheriff's Office
43565 Elizabeth Rd,
Mt. Clemens, MI
(586) 469-5151

b. Macomb County Jail
Correct Care Solutions
43565 Elizabeth Road,
Mount Clemens, MI 48043
(586) 469-5151
- Hill
- Snerling
- Lisa Fluker
- Rayvin Toma
- Jonathon Dominika
- Jason Mctevia
- Amy Mayer
- Charles Peltier
- Jeffrey Pattray

- Brandy Robinson
- Monica Patton
- Jason Labish
- James Stanley
- William Misany
- David Crabtree
- Anthony Sauger
- Eric Brillhart
- Abraham Sobh
- Adam Mayes
- Andrew Ackerman
- Alan Weir
- Brandon Spezia
- Thomas Bartoli
- Christopher Cotton
- Kyle Dupuis

- c. Community Corrections
18 Market Street, Suite C
Mt. Clemens, MI 48043
(586)307-9443
- Pat Mazzola
 - Barbara Caskey

- d. McLaren Medical Center – Macomb
Formerly Mt. Clemens Regional Medical Center
1000 Harrington St,
Mt Clemens, MI 48043
(586) 493-8000
- Stephanie Hernandez, DO
 - Karl Doelle, DO
 - C. David Stoddard, DO
 - Patrick M. Flaherty DO
 - Maggie Noonan, RN
 - Jill Orlando, RN
 - Alicia Cameron, RN
 - Alex Siomka, AS
 - Shannon Harwood
 - Kristen Cusmano
 - Kaley Jones

- Ashley Boyle
- Kimberly Brown
- Raynita Burk
- Patrick M. Flaherty
- Jordan Thayer
- Jason Barney
- Maggie Noonan, RN
- David Stoddard, DO

e. Ascension Macomb-Oakland Hospital
27450 Schoenherr Road
Warren, MI 48088
(586) 582-7825

f. Correct Care Solutions
c/o Macomb County Jail
43565 Elizabeth Road
Mount Clemens, MI 48043

- Alison Lafriniere, LPN
- Mary Krause, NP
- Lara Ianitelli
- Christopher Yax, LPN
- Christine Snyder, LPN
- Amber Pollard, LPN
- Jennifer Hobig, LPN
- Janine Forton, LPN
- Katherine Clark, LPN
- Michael Crockett, LPN
- Robyn Morse, LPN
- Tania Hoist, LPN
- Alison Lafriniere LPN
- Karen Sogge, RN
- Renee Knockeart, RN
- Shamael Hague
- Syed Hague
- Sara Breen
- Susan Barnhardt
- Mary Krause, NP
- Dinal Good

- g. Lara Ianitelli, RN
Wellpath Health Services Administrator
Macomb County Jail
43565 Elizabeth Road
Mt Clemens, MI 48043
- h. Salvation Army – Harbor Light
42590 Stepnitz Drive
Clinton Township, MI 48036
- i. Medstar Ambulance
380 N. Gratiot Ave
Clinton Twp., MI 48036
(586) 468-6510
- Ermal Nicko
- Leeann Berlin
- j. United Healthcare Community Plan
26957 Northwestern Highway, Suite 400
Southfield, MI 48033
- k. Oakland Primary Care
27450 Schoenher Rd., Suite 400
Warrant, MI 48088
- Dr. Savalli

Plaintiff reserves the right to amend this Initial Witness List at any time.

Respectfully Submitted
CHRISTOPHER TRAINOR & ASSOCIATES

/s/ Mark A. Proudman
SHAWN C. CABOT (P64021)
MARK A. PROUDMAN (P81791)
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9750 Highland Road
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mark.proudman@cjtrainor.com

Dated: October 23, 2020
SCC/map

PROOF OF SERVICE

I hereby certify that on October 23, 2020, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following: ***all attorneys of record*** and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: ***None.***

s/Mark A. Proudman (P81791)

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White Lake, MI 48386

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